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NEIL H. GREENBERG, ESQ.

JUSTIN M. REILLY, ESQ.
KEITH E. WILLIAMS, ESQ.

PARALEGALS

ROSA COSCIA
CATALINA ROMAN

Via: SDNY ECF

June 29, 2022

Hon. Judge Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Application GRANTED. This case is stayed as against Defendant
Anthony Bruno. The Clerk of Court is directed to terminate ECF No.
22. SO ORDERED

June 30, 2022

Re: *Alejandro v. Anthony Rubbish Removal Inc., et al.*; 22-cv-03452 (JMF)

Dear Judge Furman,

I represent the Plaintiff in this FLSA action. Kindly accept this correspondence as Plaintiff's request to hold this case in abeyance only as it pertains to the Individual Defendant, Anthony Bruno, as a result of Mr. Bruno filing a Chapter 7 Bankruptcy Case in the S.D.N.Y. bearing case number 22-10822-JLG.

After Defendants failed to respond to Plaintiff's Complaint, or otherwise defend this case, Plaintiff filed a request for, and received, a Certificate of Default from the Clerk of the Court. The Clerk noted Defendants' default on June 21, 2022, *see* D.E. 14-15, and Plaintiff filed a Motion for Default Judgment on June 27, 2022, *see* D.E. 18-21. Later that day, my office received a Notice of Chapter 7 Bankruptcy Case, which indicates that the proceeding was filed on June 20, 2022. A copy of the Notice is attached.

My office has not received notice that the Corporate Defendant, Anthony Rubbish Removal Inc., has filed for bankruptcy. Accordingly, Plaintiff requests that the Court determine his Motion for Default Judgment as it pertains to the corporation, and further requests that the Court hold the remainder of this case as it pertains to Mr. Bruno in abeyance pending the outcome of the Chapter 7 proceeding.

Thank you for your time and consideration of this request.

Respectfully submitted,

Keith E. Williams, Esq.